

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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J & J SPORTS PRODUCTIONS, INC.
As Broadcast Licensee of the JUNE 5,2004
DeLaHoya/Sturm Program, Plaintiff

Case No. 07 CIV 6911

JUDGE STANTON

VERIFIED ANSWER

- against -

HECTOR M. RODRIGUEZ, Individually, and as an
officer, director, shareholder and/or principal of
PUERTO RICAN NATURAL RESTAURANT INC.,
d/b/a PUERTO RICAN NATURAL RESTAURANT,
and PUERTO RICAN NATURAL RESTAURANT
INC., d/b/a PUERTO RICAN NATURAL RESTAURANT,
Defendants
-----X

Defendant, HECTOR M. RODRIGUEZ by his attorney, SAMUEL VIRUET, as
and for an Answer to the Complaint of the Plaintiff herein, respectfully alleges as
follows:

1. Admits each and every allegation set forth in ¶ 2; ¶ 3; ¶ 6; of the complaint.
2. Denies any knowledge or information sufficient to form a belief as to the truth of
the allegations contained in ¶ 1; ¶ 5; ¶ 7; ¶ 11; ¶20; ¶27 of the Complaint.
3. Denies each and every allegation set forth contained in ¶8; ¶ 9; ¶ 10; ¶ 11; ¶ 13;
¶14' ¶15; ¶17; ¶18; ¶19; ¶ 21; ¶ 22; ¶ 23; ¶ 25; ¶ 26; ¶ 28; ¶ 29; ¶ 31; ¶ 32; ¶ 33; ¶
34; ¶ 35; and ¶ 36of the Complaint.

AS AND FOR A FIRST, SEPARATE AND COMPLETE
AFFIRMATIVE DEFENSE BY DEFENDANT

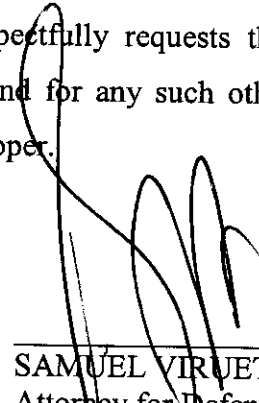
4. The Complaint must be dismissed in that fails to state a cause of action upon
which relief may be granted.

AS AND FOR A SECOND SEPARATE AND
COMPLETE AFFIRMATIVE DEFENSE

5. That the complaint must be dismissed due to lack of jurisdiction as pleadings were not served in accordance with Civil Practice Laws and Regulation mandate.

WHEREFORE, the defendant respectfully requests that the court demands a judgment dismissing plaintiff complaint and for any such other, further, and different relief as to this Court may seem just and proper.

Dated: August 22, 2007S



SAMUEL VIRUET, ESQ.
Attorney for Defendant
191 E. 161 St.
Bronx, NY 10451
(718) 588-6400

TO:
LONSTEIN LAW OFFICE, PC
1 Terrace Hill: PO Box 351
Ellenville, NY 12428

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VERIFICATION

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Defendants

-----X
STATE OF NEW YORK }

JS:

COUNTY OF BRONX }

I, HECTOR M. RODRIGUEZ, being duly sworn, depose and state that I am the
Defendant in the within pending cause of action; that I have read the foregoing papers
and know the contents of the statements herein and affirm that they are true on all
matters asserted thereon except upon those matters stated to be upon information and
belief and as to that, I firmly believe them to be true.


HECTOR M. RODRIGUEZ Deponent


Signed and subscribed to before this 22 day of August, 2007

SAMUEL VIRUET
Notary Public, State of New York
No. 24-4932287
Qualified in Putnam County
Commission Expires on May 2, 2010

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Defendants

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***Verified Answer
and
Demand for Discovery***



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